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Counsel for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF JONATHAN TSE IN
SUPPORT OF GOOGLE LLC'S
ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF OPPOSITION TO
PLAINTIFFS' MOTION FOR LEAVE
TO AMEND COMPLAINT**

Referral: Hon. Susan van Keulen

1 I, Jonathan Tse, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney at Quinn Emanuel
3 Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action. I make
4 this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I
5 could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of Google
7 LLC’s Administrative Motion to Seal Exhibit A of Google’s Submission Re: P23 in Response to
8 Dkt. 450-1. In making this request, Google has carefully considered the relevant legal standard and
9 policy considerations outlined in Civil Local Rule 79-5. Google makes this request with the good
10 faith belief that the information sought to be sealed consists of Google’s confidential information
11 and that public disclosure could cause competitive harm.

12 3. The aforementioned all comprise confidential information as the materials involve
13 Google’s employees working on certain products that Google does not share publicly and maintains
14 as confidential in the ordinary course of its business and is not generally known to the public or
15 Google’s competitors. Specifically, this information provides details related to the names,
16 organizational division, manager, and title of Google employees working on certain products. Such
17 information reveals Google’s internal strategies and business practices for operating and
18 maintaining many of its important services.

19 4. Public disclosure of the above-listed information would harm Google’s competitive
20 standing by revealing confidential information relating to Google’s employees working on certain
21 competing products to Google’s competitors, allowing them to understand which employees are
22 working on which competing products and recruit or contact those employees, alter their own plans
23 for product development and/or commercialization, time strategic litigation, focus their patent
24 prosecution strategies, or otherwise unfairly compete with Google.

25 5. For these reasons, Google respectfully requests that Exhibit A be filed under seal.
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1 I declare under penalty of perjury of the laws of the United States that the foregoing is true
2 and correct. Executed in San Francisco, California on March 2, 2022.

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4 DATED: March 2, 2022

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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6
7 By /s/ Jonathan Tse

Jonathan Tse

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9 *Attorney for Defendant*
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